

EXHIBIT A

District of Texas

FILED

February 27, 2023

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
_____ DIVISION

Larry V. Bryant

versus

Texas City ISD
(Independent School
District)

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CIVIL ACTION NO. _____

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

Larry V. Bryant

Address:

6806 Anderson St.

Texas City, TX 77591

County of Residence:

Galveston

3. The defendant is:

Texas City ISD

Address:

1700 9th AVE N

Texas City, TX 77590

☐ Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on _____ with the Equal Opportunity Commission.

5. On the date of Oct 3, 2022, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☐ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☒ religion
- (e) ☐ national origin,

the defendant has:

- (a) ☐ failed to employ the plaintiff
- (b) ☒ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff

(d) ☐ other: retaliation, coercion, harassment

Unfair treatment, disregard to health risks
(personal & moral beliefs) humiliation

7. When and how the defendant has discriminated against the plaintiff: As a school bus driver

On Sept 1, 2022 as a result of a minor accident on

Dept grounds, the director made disturbing, harassing phone

calls to my phone & later ordered me to ride in a car with

someone who is suspect placing me at risk with health & religious morals

8. The plaintiff requests that the defendant be ordered:

- (a) ☒ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☒ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff

note: The Transportation Director previously fired
me in Feb 22 w/ baseless whereas HR reversed
the termination & reinstated my job as a bus driver

(e) ☐ to _____

_____ and that;

(f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.

L. Bryant
(Signature of Plaintiff)

Address: 6806 Anderson St.
Texas City, TX. 77591
Telephone: 409-354-6034